**STATEMENT OF BASIS**
**CITY OF SEQUIM**
**NATIONAL POLLUTANT DISCHARGE**
**ELIMINATION SYSTEM (NPDES) PERMIT NO. WA0022349**

The purpose of this Statement of Basis is to explain the Department of Ecology (Department) is modifying the permit to delay toxicity testing, to allow the city of Sequim to complete improvements that will change the treatment process at the plant. These improvements are now under construction.

## I. GENERAL INFORMATION

A. Permittee: City of Sequim
152 West Cedar Street
Sequim, WA 98382

B. Discharge Locations: Strait of Juan de Fuca (001)
Latitude: 48° 5' 29" N
Longitude: -123° 2' 11" W

Bell Creek (002)
Latitude: 48° 4' 49" N
Longitude: -123° 5' 3" W

## II. REQUEST FOR MODIFICATION

On August 4, 2008, the city of Sequim requested a permit modification to delay toxicity testing in order to complete improvements that will change the treatment process at the plant.

Section S8.A will be modified from:

**A. Testing Requirements**

The Permittee shall test final effluent once in the last summer and once in the last winter prior to submission of the application for permit renewal. The two species listed below shall be used on each sample and the results submitted to the Department as a part of the permit renewal application process. The Permittee shall conduct acute toxicity testing on a series of five concentrations of effluent and a control in order to be able to determine appropriate point estimates and an NOEC. The percent survival in 100 percent effluent shall also be reported.

To:

**A. Testing Requirements**

Within one year of filing the Notice of Completion of Construction for the Phase 1A improvements, described in the city of Sequim Water Reclamation Facility Expansion Engineering Report, September 2007; the Permittee shall test final effluent once in the summer and once in the winter. The two species listed below shall be used on each sample and the results submitted to the Department within 30 days of receipt of sample

results from the laboratory. The Permittee shall conduct acute toxicity testing on a series of five concentrations of effluent and a control in order to be able to determine appropriate point estimates and an NOEC. The percent survival in 100 percent effluent shall also be reported.

Section S9.A will be modified from:

**A. Testing Requirements**

The Permittee shall test final effluent once in the last summer and once in the last winter prior to submission of the application for permit renewal. All of the chronic toxicity tests listed below shall be conducted on each sample. The results of this chronic toxicity testing shall be submitted to the Department as a part of the permit renewal application process.

To:

**A. Testing Requirements**

Within one year of filing the Notice of Completion of Construction for the Phase 1A improvements, described in the City of Sequim Water Reclamation Facility Expansion Engineering Report, September 2007; the Permittee shall test final effluent once in the summer and once in the winter. All of the chronic toxicity tests listed below shall be conducted on each sample. The results of this chronic toxicity testing shall be submitted to the Department within 30 days of receipt of sample results from the laboratory.

This Statement of Basis will serve as an amendment to the fact sheet and permit.

## APPENDIX A – RESPONSE TO COMMENTS

Ecology received one comment letter (an e-mail) regarding the permit modification. In the e-mail, Protect the Peninsula's Future (PPF) raised several issues that are related to the City's permit, but two seemed germane to the proposed permit modification.

Comment 1:

> PPF asked that Ecology publish notices with respect to this discharge in the Peninsula Daily News.

Response 1:

> Publishing notices in the nearest newspaper is an Ecology practice state-wide. As a result, we will most likely continue publishing notices in the Gazette.

Comment 2:

> PPF asked that the City minimize its effluent toxicity during construction.

Response 2:

> Ecology concurs that the City should minimize its effluent toxicity to the extent it can during construction.